

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In Re:)
)
CRIMSONBIKES, LLC)
)
Involuntary Debtor) Chapter 7
) Case No. 21-10278(JEB)
)

**MOTION OF ALLEGED DEBTOR TO CONVERT INVOLUNTARY CHAPTER 7 TO
CHAPTER 11**

To the Honorable Janet E. Bostwick, Bankruptcy Judge:

NOW comes the Alleged Debtor in the above captioned case and moves this Court, pursuant to 11 U.S.C. sec. 706(a), to convert this case to a case under Chapter 11 and in support thereof, the Alleged Debtor states the following:

1. An involuntary petition under Chapter 7 was filed against the Alleged Debtor on March 3, 2021.
2. The Alleged Debtor filed a Motion to Dismiss and Request for Costs, Fees and Damages, or In the Alternative Convert the Chapter 7 Case to One under Chapter 11 of the United States Bankruptcy Code on April 28, 2021. As part of the Motion to Dismiss, the Alleged Debtor sought, in the alternative, a conversion of the case to chapter 11 of the Bankruptcy Code. On this date, the Alleged Debtor is withdrawing the Motion to Dismiss. Contemporaneous with this Motion, the Alleged Debtor filed a Response to the Involuntary Petition.

3. Pursuant to 11 U.S.C. sec. 706(a), the Debtor may convert a case under this Chapter 10 a case under Chapter 11...if the case has not been converted under section 1112, 1208 or 1307 of this title.

4. This case has not been converted under Section 1112, 1208 or 1307.

5. The Alleged Debtor will pay the conversion filing fee if this Motion is approved by the Court.

WHERFORE, the Debtor requests that this Court enter an Order converting this case to a case under Chapter 11.

Respectfully Submitted,
CrimsonBikes, LLC
By its Attorney,

/s/ John M. McAuliffe, Esq.
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